

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Canadian Linen and Uniform Service Inc.
PROPOSAL NAME: Canadian Linen – Industrial Laundry Facility
CLASS OF DEVELOPMENT: 1
TYPE OF DEVELOPMENT: Manufacturing -
CLIENT FILE NO.: 5712.00

OVERVIEW:

Manitoba Conservation and Water Stewardship received a Proposal on February 5, 2014 for the continued operation of an industrial laundry facility located at 1860 King Edward Street in Winnipeg, Manitoba. The facility provides washing and drying services for industrial linens, shop, print towels and floor mats.

The Department, on May 16, 2014, placed copies of the Proposal in the Public Registries located at Legislative Library (200 Vaughan Street), the Winnipeg Millennium Public Library in Winnipeg and online at <http://www.gov.mb.ca/conservation/eal/registries/5712cdnlinen/index.html>. Copies of the Proposal were also provided to the Technical Advisory Committee (TAC) members. A notice of the Environment Act proposal was also placed in the Winnipeg Free Press on May 17, 2014. The newspaper and TAC notifications invited responses until June 17, 2014.

COMMENTS FROM THE PUBLIC:

No Comments

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Canadian Environmental Assessment Agency

No Comments.

Manitoba Agriculture – Land Use Branch

No Concerns.

Manitoba Conservation and Water Stewardship –Compliance and Enforcement Branch

The Environmental Compliance and Enforcement Branch of Manitoba Conservation and Water Stewardship has reviewed the above noted proposal and would like to make the following comments:

1. *Can the proponent please provide the following information:*
 - a. *When was the wastewater treatment system installed?*
 - b. *What are the maintenance requirements for the wastewater treatment system?*
 - c. *Who maintains the wastewater treatment system and how often is the work performed?*
 - d. *Is the effluent from the wastewater treatment system tested to confirm compliance with the city sewer by-law? If so, how often is the testing is conducted?*
2. *The proposal discusses VOC emissions based on three wastewater samples collected over a two day period in December 2013. In order to get a more accurate calculation of VOC's produced per annum, more wastewater samples would need to be collected over a longer timeframe that takes into account periods of high volume processing versus low volume processing for a more accurate representation of VOC's produced at the site. Furthermore, there is no discussion on how VOC's emitted in the workplace are mitigated other than the mention of some protocols to limit staff exposure.*

June 25, 2014 Proponent Response

Hello here are the comments you asked for.

1.
 - a. The system was started April 1 / 2014.
 - b. DAF is cleaned once a week as well as the Voc and the press is cleaned once/day.
 - c. We have a rotating shift and one man work in the DAF room for a Month 8 hrs /day.
 - d. The testing is done every two hrs by the shift operator.
2.
 - a. The VOC tests were started in April to the end of May.
 - b. Each of the shift operator have their own respirators.

June 26, 2014 Environmental Compliance and Enforcement Comment

The Environmental Compliance and Enforcement Branch of Manitoba Conservation and Water Stewardship has reviewed the supplementary information provided on June 25, 2014 for the above noted proposal and would like to make the following comments:

The information provided does not accurately address the comment regarding VOC emissions. Page 9 of the EAP specifically states,

“Using wastewater sample collected by IWCL, a model was created to estimate the mass of VOCs emitted to the air as a result of the wastewater treatment process. The model assumes that 100% of waterborne VOCs will be removed and discharged to the air. Further, the model was run using the highest concentrations of VOCs detected during the sampling (see Appendix H)”

The sample results in Appendix H indicate that one water sample was collected on Dec.16, 2013 and two more were collected on Dec. 17, 2013. The samples were submitted to Maxxam Laboratory on Dec. 17, 2013 for analysis of VOCs in water by HS GC/MS.

The model IWCL used to estimate annual VOC emissions is based on one round of sampling that does not accurately reflect what the VOC concentrations in the wastewater are during high volume processing (peak flow) versus low volume processing (low flow).

If additional VOC sampling was conducted from April through May 2013 as stated in the supplementary information provided, why were those sample results not included in the model or provided in Appendix H? Please clarify.

July 10, 2014 Proponent Response

Regarding the ECEB additional info request;

The attached Excel file contains the VOC concentrations from all of the samples collected to date. The model was run using the highest concentrations of VOCs detected during the December 16-17 sampling (the concentrations used are highlighted in yellow in the Excel file). The model was run in this manner to provide a worst case scenario for the volume of VOCs to be released to atmosphere during treatment. The subsequent sampling results have been below the levels used in the model.

The EAP report contained only the December 16-17 samples, as the other sampling took place after the report was submitted. The sampling which commenced in March, 2014 is intended to provide confirmation to Canadian Linen that the wastewater treatment system is functioning as designed. A monthly sampling program will be implemented to confirm compliance with the City’s discharge limits and to generate more accurate VOC emission rates commencing in August. Parameters to be sampled: BOD, TSS, VOC’s, metals and oil & grease.

Please let us know if there is anything else that you require.

Concentration (ug/L)

| Sample Date | Toluene | Ethylbenzene | Xylenes (total) | Tetrachloroethene | Bromidochloromethane |
|-------------|---------|--------------|-----------------|-------------------|----------------------|
| 16-Dec-13 | 730 | 120 | 820 | 210 | <1 |
| 17Dec2013 | | | | | |
| @ 09:15 | 36 | 7.8 | 61 | 8.3 | 1.4 |
| 17Dec2013 | | | | | |
| @ 14:30 | 330 | 17 | 99 | 1.5 | 1.1 |
| 30-Jan-14 | 450 | 11 | 70 | 56 | <5 |
| 18-Mar-14 | 150 | 13 | 82 | 65 | 1.2 |
| 19-Mar-14 | 380 | 5.7 | 42 | 1.8 | 1.1 |
| 23-Apr-14 | 400 | 6.1 | 67 | 4.4 | ND |
| 06-May-14 | 180 | 5.2 | 41 | 95 | ND |
| 12-May-14 | 13 | 0.8 | 7 | 1.9 | ND |

Disposition

The proponent responded providing a clarification regarding wastewater treatment facility and VOC sampling and analysis. Environmental Complacence and Enforcement has reviewed the responses and has no further comments. In addition clauses 26 and 28 of the draft Environment Act Licence address the requirements for wastewater discharge from the facility.

Manitoba Conservation and Water Stewardship – Programs and Strategies Branch – Air Quality Section

Air Quality Section has reviewed the above proposal and provides the following comments:

- It is expected that based on the submitted proposal, there will be no significant impact on air quality as the estimated emissions of contaminants and resulting ambient concentrations are much lower than the exiting ambient limits (i.e Ontario).
- Air Quality Section suggests that the EA Clause regarding odour nuisance be included in the licence.

Disposition

Clause 8 of the draft Environment Act Licence addresses the requirements to odour management.

Manitoba Conservation and Water Stewardship – Wildlife Branch

No Concerns

Manitoba Conservation and Water Stewardship – Parks and Protected Spaces Branch

Parks and Protected Spaces Branch has reviewed the proposal submitted in pursuit of the *Environment Act* for the Request for review/comment - EAP - Canadian Linen File: 5712.00. The Branch has no comments or concerns to offer as it does not affect any provincial parks, park reserves, ecological reserves, areas of special interest, or proposed protected areas.

Manitoba Conservation and Water Stewardship – Forestry Branch

No Response.

Manitoba Conservation and Water Stewardship – Aboriginal Relations Branch

No Response.

Manitoba Conservation and Water Stewardship – Lands Branch

No Concerns.

Manitoba Conservation and Water Stewardship – Water Quality Management Section

No Concerns.

Manitoba Conservation and Water Stewardship – Groundwater Management Section

The Groundwater Management Section has reviewed File 5712.00 application and has the following comment.

The provincial water well database indicates that a well was drilled on the site in 1992. If this well is not being used it should be properly sealed. Prior to being sealed it should be sampled and tested for possible contaminants that may have originated on the site. Once the sample results have been reviewed direction will be given on sealing the well. It is recommended that the well be sealed by a well drilling professional and a sealing report be submitted to the province.

June 25, 2014 Proponent Response

The well that is being mentioned (the pipe was 30” above the asphalt with a mental sealed cap on it) and was never used when Canadian Linen took over in 1998. When we added the DAF room in 2013 the contractor had some well company come in and stated that they will have to cut down the pipe and seal the inside of the pipe before the ground can be covered.

Disposition

The proponent provided additional information regarding the water well identified on the site. The Groundwater Management Section reviewed the response and had no further comment.

Manitoba Conservation and Water Stewardship– Fisheries Branch

No Response.

Manitoba Conservation and Water Stewardship – Office of Drinking Water

No Concerns

Manitoba Conservation and Water Stewardship– Water Use Licensing Section

No Concerns.

Manitoba Conservation and Water Stewardship – Water Control Works Licensing Section

No Concerns.

Manitoba Conservation and Water Stewardship– Climate Green Initiative Branch

No Response.

Manitoba Conservation and Water Stewardship– Regional Services Branch

No Response

Manitoba Culture, Heritage and Tourism – Heritage Branch

No Response.

Manitoba Innovation Energy and Mines – Energy Development Branch

No Response.

Manitoba Innovation Energy and Mines – Petroleum Branch

No Response.

Manitoba Infrastructure and Transportation – Flood Forecasting Branch

No Response.

Manitoba Infrastructure and Transportation – Highway Planning and Design Branch

No Concerns.

Manitoba Municipal Government

No Response

Manitoba Health – Environmental Health Unit

No Response.

Manitoba Labour – Office of Fire Commissioner

The proponent shall submit to the local fire authority, the Winnipeg Fire Paramedic Service, an updated fire safety plan in accordance with Section 2.8 of the Manitoba Fire Code.

Disposition

The proponent is notified of the recommendation to obtain an updated fire safety plan. In addition the Licence cover letter requires the licensee to comply with any other legislative requirements.

Manitoba Labour – Work Place Safety & Health

No Response

PUBLIC HEARING:

A public hearing is not recommended.

CROWN-ABORIGINAL CONSULTATION:

The Government of Manitoba recognizes that it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

This facility is an existing industrial laundry facility located on a private land within the boundary of the City of Winnipeg. There would be no infringement of aboriginal or treaty rights under Section 35 of the Constitution Act, 1982. Therefore, it is concluded that Crown-Aboriginal consultation is not required for the project.

RECOMMENDATION:

The Proponent should be issued a Licence for the continued operation of an industrial laundry facility in accordance with the specifications, terms and conditions of the attached draft Licence. Enforcement of the Licence should be assigned to the Environmental Compliance and Enforcement Branch of Manitoba Conservation and Water Stewardship.

A draft Environment Act Licence is attached for the Director's consideration.

Prepared by:

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July 15, 2014

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